

**IN RE:** Dominion Energy South Carolina, ) **SOUTH CAROLINA OFFICE**  
Incorporated's 2021 Avoided Cost ) **OF REGULATORY STAFF'S**  
Proceeding Pursuant to ) **FIRST AND CONTINUING**  
S.C. Code Ann. § 58-41-20(A) ) **AUDIT REQUEST FOR**  
) **BOOKS, RECORDS, AND**  
) **OTHER INFORMATION**  
)

As used in these requests, “identify” means, when asked to identify a person, to provide the full name, business title, address and telephone number. As used in these requests, “address” means mailing address and business address. When asked to identify or provide a document, “identify” and “provide” mean to provide a full and detailed description of the document and the name and address of the person who has custody of the document. In lieu of providing a full and

detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word “document” is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

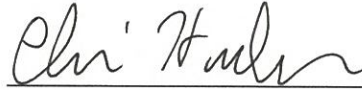
- I. All information shall be provided to ORS in the format requested.
- II. All responses to the requests below must be labeled using the same numbers as the requests.
- III. The requested information shall be available on the Company’s SharePoint site in a designated folder accessible to Ryder C. Thompson, O’Neil Morgan, Robert Lawyer, Christopher M. Huber, Esq., and Jenny R. Pittman, Esq. of ORS.
- IV. If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- V. That any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Ryder C. Thompson [803.737.0664], O’Neil Morgan [803.737.0154], Robert Lawyer [803.737.0584], Christopher M. Huber, Esquire [803.737.5252], or Jenny R. Pittman, Esquire [803.737.0794] of ORS.
- VI. This entire list of questions shall be reproduced and included in front of each set of responses.
- VII. Unless otherwise set forth below, DESC shall provide responses with live formulas in spreadsheets used to produce responses, whether or not the responses themselves are in spreadsheet format.

- VIII. Unless otherwise set forth below, DESC shall provide all documents in a searchable format. In addition, DESC shall upload to the Company's SharePoint site in a designated folder the responses no later than the day the responses are due to ORS.
- IX. If the response to any request is that the information requested is not currently available, please state when the information requested will be provided to ORS.
- X. In addition to the signature and verification at the close of DESC's responses, the DESC witness(es) or employee(s) or agent(s) responsible for the information contained in each response shall be indicated at the bottom of each response.
- XI. This request shall be deemed to be continuing so as to require DESC to supplement or amend its responses as any additional information becomes available.
- XII. If the information requested is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- XIII. For every page produced to ORS that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which the Company designates as confidential information must also be marked by notation, highlighting, or other conspicuous means.

**REQUESTS:**

- 1-1 Provide a list of the names of the witnesses the Company intends to call and describe the subject matter for which each witness intends to testify to at the hearing in this matter.
- 1-2 Produce copies of any Company correspondence, requests for information and responses, oral or written, from or to any other party in this Docket.
- 1-3 Provide and produce the documents, tariff and/or supporting calculations for the Company's upcoming proposal of the following:
  - (a) Avoided cost methodology;
  - (b) Avoided energy and capacity rates and tariff;
  - (c) Standard offer rates, requirements, terms, conditions and tariff;
  - (d) Form contract purchase power agreements;
  - (e) Commitment to sell form, terms and conditions; and
  - (f) Other terms and conditions necessary to implement S.C. Code Ann. Section 58-41-20(A).

- 1-4 Provide a functional copy of the spreadsheets underlying the updated avoided energy, avoided capacity and variable integration charge rates.



Christopher M. Huber, Esquire  
Jenny R. Pittman, Esquire  
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April 30, 2021